

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON,
ISSACCA POWELL, KEITH BURGESS,
TRAVIS BOYD, and TERRENCE DRAIN,
and KIMBERLY ALLEN on behalf of
themselves and all similarly situated
persons,

PLAINTIFFS,

V.

BILL OLDHAM, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity and in her official capacity as the of Assistant Chief Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; and TYLER TECHNOLOGIES, INC., a foreign corporation,

DEFENDANTS.

Case No. 2:16-cv-2907-SHM/tmp

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE CIVIL RIGHTS
ACT OF 1871, 42 U.S.C. § 1983, AND
TENNESSEE COMMON LAW**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV. PRO. 38(a)
& (b)**

SUGGESTION OF DEATH

COME NOW Plaintiffs, Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell *deceased*, Keith Burgess, and Travis Boyd, on behalf of themselves and all other

similarly situated persons, by and through their designated attorneys, and, hereby suggests to the Court and the parties in this cause that Defendant, Issacca Powell, died on February 4, 2019.

Respectfully submitted,

/s/Brice M. Timmons

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*Counsel for Plaintiffs and the putative Class
Members*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of June, 2019, the foregoing document was served upon all parties to this action via the Court's ECF system

/s/ Brice M. Timmons.